



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

US EPA RECORDS CENTER REGION 5



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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

202-382-484

Benjamin Van Duren, Sc.D.
Professor of Environmental Medicine
New York University Medical Center
550 First Avenue
New York, New York 10016

Dear Dr. Van Duren,

In following up on our conversation of April 28, I am a technical member of the EPA litigation team involved in civil litigation against the Reilly Tar and Chemical Corporation for their former site in St. Louis Park, Minnesota, a suburb of Minneapolis. I am searching for expert witnesses who would testify on the adverse effects that polynuclear aromatic hydrocarbons could have on humans. Dr. Elizabeth Anderson of the Carcinogen Assessment Group has suggested that I contact you in this regard.

Attachment I is a brief description of the site. The State of Minnesota has conducted many tests of the wells in and near St. Louis Park. Attachment II lists the results of some of the testing; please treat this data in a confidential manner. As you can see, PAH are found in a range of concentrations from barely detectable to near solubility levels in wells 5 and 15. The analyses are not exhaustive of all the compounds which could be present. Additional testing will be done.

The exposure route that we are concerned about is ingestion of contaminated drinking water. A past epidemiological study using a questionable methodology produced inconclusive results. Further studies may be done. In any event, under the statutes which we have filed suit, the Resource Conservation and Recovery Act and the Comprehensive Environmental Response, Compensation and Liability Act, we do not have to demonstrate actual harm but rather that the "disposal of any solid waste or hazardous waste may present an imminent and substantial endangerment to health."

If you have an interest in participating in this effort, please send me your resume. The litigation team will then interview the perspective experts and upon selection, contractual arrangements will be made.

Attachment I

Site Description

From 1917 to 1971 Reilly-Tar Chemical Company re-tar, which they purchased from various sources and pr-coke plants in recent years, and treated wood with cr-occupied an 80-acre site in St. Louis Park, Minnesota a western suburb of Minneapolis. The City purchased 1970, upon the closing and demolition of existing str-The site is presently vacant land with a condominium at one corner. Over the past several years, many stu-identified the threat to public health, the contamina-groundwater and soil and a list of remedial actions n-correct this situation. The main contaminant involve-site are Polynuclear Aromatic Hydrocarbons (PAH). Al-are phenols and creosote. There is a heavily contami-of soil on the site itself, extending off-site in the surface drainage. During the years of operation, Rei-several storage lagoons. The site of these lagoons i-contaminated. The complex groundwater situation has-to the contamination of groundwater within a two to t-radius of the site, including several different aquif-surficial aquifer contains large pockets of immiscibl-carbons. In addition, tar-like substances ooze to th-face on hot days.

I appreciate your attention on this matter, and I hope to hear from you soon.

Sincerely yours,

Michael W Kosakowski

Michael W. Kosakowski
Acting Chief, Compliance Branch
Office of Waste Programs
Enforcement

Attachment II

BECGEOVG

TABULATION SHEET

TOPIC St. Louis Park Municipal Wwts.

date of sample	lab number	total volume pumped in previous 24 hours lx 1000 gal.	nanograms/liter = parts per trillion										Total P14			
			2-methylnaphthalene	acenaphthalene	biphenyl	anthracene	phenanthrene	pyrene	1,2,6,7-tetrahydronaphthalene	fluorene	fluoranthene	1,2-dibenzanthracene	benzo (a) pyrene	benzo (e) pyrene	benzo (g,h,i) perylene	benzo (k) fluoranthene
Louis Park #4																
Louis Park #6	6563		1.230	47	66	87			5.8	3.8	3.6	5.4	42.2	2437	42.6	
Louis Park #8	6564		<24	45.5	<24	<14			43.7	43.8	43.6	45.4	42.2		42	
Louis Park #10	6565		<24	45.5	5.8	44			43.7	43.8	43.6	45.4	42.2	5.7	42	
Louis Park #11	6566		<24	45.5	<24	<14			43.7	43.8	43.6	45.4	42.2		42	
Louis Park #12	6567		<24	45.5	<24	<14			43.7	43.8	43.6	45.4	42.2		42	
Louis Park #13	6568		<24	45.5	<24	<14			43.7	43.8	43.6	45.4	42.2		42	
Louis Park #14	7114		<120	34	36	47			3.5	44.0	44.0	46.0	43.4	47.3	42	
Louis Park #15	7115		<600	(500)	1000	<84			450	40	420	30	41.7	2820	43.4	
Louis Park #16																
Louis Park #17	7386		300	19	43	<14			1.9	43.2	43.8	7.4	44.2	3713	43.4	
Louis Park #18	7387		290	18	44	<14			2.0	43.2	43.8	12	44.2	366.0	43.4	
Louis Park #19	7388		290	16	46	<14			2.4	43.2	43.8	6.4	44.2	3454	43.4	
Louis Park #20	7389		280	17	42	<14			5.1	43.2	43.8	6.4	44.2	3421	43	
Louis Park #21	7796		<100	<24	410	<6			417	424	415	424	416		412	
Louis Park #22	7797		<100	<24	410	<6			417	424	415	424	416		412	
Louis Park #23	7798		<100	930	690	<4			810	65	415	44	416	2539.0	412	
Louis Park #24	7799		<100	1140	1000	<6			550	53	415	38	416	2711.0	412	
Louis Park #25																
Louis Park #14	6569			37	11	12	<14		43.7	43.8	43.6	45.4	42.2	162.0	42.4	
Louis Park #15	6570			4120	428	1300	<70		830	39	418	427	41.0	2169.0	413	
Louis Park #16	6571			<24	45.5	6.0	<14		43.7	43.8	43.6	45.4	42.2	16.0	42.4	
Louis Park #17	55087			467	(300)	1700	<6		510	452	425	422	41.0	5110.0	41.0	
Louis Park #18	55095			467	2400	1800	<6		440	452	425	422	41.0	4640.0	41.0	
Louis Park #19	55102			467	2800	1900	<6		380	452	425	422	41.0	5030.0	41.0	
Louis Park #20	55123			<22	450	60	400		190	<5	<11	<11	<11			

Compound	WELL:	Sample Number													#1 #12 #13	File #1 #12
		#3 343	#4 310	#5 311	#6 312	#7 317	#8 313	#9 314	#11 317	#12 309	#13 315	#14 320	#15 319			
Naphthalene		99	<10	132	<10	<10	145	<10	<10	182	11	145	1180	14	2	
Acenaphthylene		<60	<60	2280	<60	<60	<60	<60	<60	<60	<50	<60	1475	60	<5	
Acenaphthene		185	107	6560	<60	<60	<60	<60	<60	<60	91	<60	780	<60	<6	
Fluorene		18	27	2210	<10	<10	<10	<10	<10	<10	<10	<10	249	12	<1	
Phenanthrene		<10	<10	2210	<10	<10	<10	<10	<10	<10	<10	<10	17	113	45	5
Anthracene		<31	<31	1300	<31	<31	<31	<31	<31	<31	<31	<31	362	<31	<3	
Fluoranthene		<1	6	716	<1	<1	<1	4	<1	<1	<1	<1	532	<1	<1	
Pyrene		2	10	603	<2	<2	<2	<2	<2	<2	<2	<2	6	360	4	<1
Benz(a)anthracene		<1	<1	4	<1	<1	<1	<1	<1	1	<1	<1	9	<1	<1	
Chrysene		<2	<2	<2	<2	<2	<2	<2	<2	<2	<2	<2	5	<2	<2	1
Benzo(k)fluoranthene		<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1
Benzo(a)pyrene		<1	<1	<2	<1	<1	<1	<1	<1	<1	<1	<1	<1	<2	<1	<1
Dibenzo(a,h)anthracene		<1	<1	<4	<1	<1	<1	<1	<1	<1	<1	<1	<3	<1	<1	
Benzo(g,h,i)perylene, 7,12-dimethyl benzo(a)anthracene.		<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1

*All concentrations are expressed in parts per trillion